

AMENDED

In the United States District Court
For the Western District of Michigan

FILED - GR

December 17, 2008 11:41 AM

RONALD C. WESTON, SR., CLERK
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: LEP

Robert Ferguson
(Enter above the full names of all plaintiffs, including prisoner number, in this action.)

Sheriff Lawrence Stelzer, Eaton County Board of Commissioners, Capt. Randy Demory, Capt. Singleton, Sgt. Burharty, Sgt. Therne, Sgt. Tanara McPhee, Deputy Holmes et. al.
(Enter above the full name of the defendant or defendants in this action.)

COMPLAINT

I. Previous Lawsuits

CAUTION: The Prison Litigation Reform Act has resulted in substantial changes in the ability of incarcerated individuals to initiate lawsuits in this and other federal courts without prepayment of the required \$350 filing fee. Accurate and complete responses are required concerning your litigation history. Generally, a plaintiff's failure to accurately and completely answer the questions set forth below will result in denial of the privilege of proceeding *in forma pauperis* and require you to pay the entire \$350 filing fee regardless whether your complaint is dismissed.

A. Have you ever filed a lawsuit while incarcerated or detained in any prison or jail facility? Yes No

B. If your answer to question A was yes, for each lawsuit you have filed you must answer questions 1 through 5 below. Attach additional sheets as necessary to answer questions 1 through 5 below with regard to each lawsuit.

1. Identify the court in which the lawsuit was filed. If it was a state court, identify the county in which the suit was filed. If the lawsuit was filed in federal court, identify the district within which the lawsuit was filed.
Federal Court the Western District
2. Is the action still pending? Yes No
a. If your answer was no, state precisely how the action was resolved: It was dismissed with prejudice
3. Did you appeal the decision? Yes No
4. Is the appeal still pending? Yes No
a. If not pending, what was the decision on appeal? _____

5. Was the previous lawsuit based upon the same or similar facts asserted in this lawsuit? Yes No
If so, explain: _____

United States District Court
for the Western District of Michigan

Dec. 14, 2008

Robert Long Ford
Plaintiff,

v.

Lawrence Stelma et al.,
Defendants

Case No. 1:08-CV-836
Honorable Paul J. Maloney

"List of all Defendants and place of Employment"

The Kent County Board of Commissioners employed by the County address is 300 Monroe N.W. Grand Rapids, Mi. 49503: Sheriff Lawrence Stelma, Capt. Randy Wengen, Capt. Singleton, Sgt. Burnheart, Sgt. Therney, Sgt. Tammara McDiarmid, Deputy Homes, Sgt. Aaron Case, Deputy Russ Stonehouse, Deputy Townsend, Robert Steel, Lt. Freeman, Cathy White, Dr. Bill Jacobs, Dr. Carol, Dr. John Krisman, Cera Warhois, Marry Colter, Carmella Johnston, Deputy Buttson all are employed at Kent County Sheriff department.

II. Place of Present Confinement Kent County Correctional Facility

If the place of present confinement is not the place you were confined when occurrence that is subject of instant lawsuit arose, also list the place you were confined: Same as the above

III. Parties

In Item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.

A. Name of Plaintiff Robert Langford
Address 815 Warf Ct. Huntsville, Al. 35810

In Item B below, place the full name of the defendant in the first blank, his or her official position in the second blank and his or her place of employment in the third blank. Use Item C for the names, positions and place of employment of all additional defendants. Attach extra sheets as necessary. State whether you are suing each defendant in an official or personal capacity.

B. Defendant Lawrence Stiles is employed as Neal Sheriff
at Kent County Correctional Facility

C. Additional Defendants The entire County Board of Commissioners employed for Kent County, Deputy Russ Stiles, Deputy Townsend, Lt. Treasurer, Robert Stiles, Sgt. Alton Case, Cathy White, Dr. Bill Jacobs, Deputy Honey, Dr. Carol, Dr. John Krieger, Cera Danholse, Mary Callender, Anna Johnston, Sgt. Tamara McWain, Sgt. Burnhart, Sgt. Thorpe, Deputy Buttman.

IV. Statement of Claim

State here, as briefly as possible, the facts of your case. Describe how each defendant is personally involved. Include also, the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets if necessary.

On Jan 8, 2007 I was taken psychiatric drug for depression, Stress and also was being given Zorcon without knowing it, I have told medical staff what was being given that I was ever taken Zorcon, Dr. Bill 2 years with lead physician for the County jail got my information from MDOC and what a Prescription

without speaking to me in regard to the medication, the Veterans administration sent me money and family that didn't you don't I was being charged for medication \$15.00, when I inquire about the medication I was told by Nurse it was psychotropic drugs they the medical refused to return my money to my account, I was also denied medical service by the head Supervisor Cass Daubney, headache. Mary Collier 1st shift, Carmella Tolerton 2nd shift headache, Dr. John Krieman. I've been denied health services. I've sent Kite to medical requesting to be seen for my shoulder on 5-1-08, 5-19-08, 6-4-08, 7-5-08, 7-8-08, 7-10-08, 6-22-08, 7-24-08 this is the time that I have Kite medical to be treated for my shoulder, "Never happen"!!!

Paragraph (B).

Jan 8, 2008 I was subjected and confined to upper Mat Cell block 58 where there is hot, window was not we were exposed to the element of the bitter cold weather, the administration and Capt. Sgt. Krieling this refused to relocate us until the heat or window was replaced in the meantime I developed severe pain in my right shoulder and shoulder blade, it to the point I rarely sleep, the Dr. was trying to give me anti-inflammatory medication, in which I can't take because it contain aspirin, I was given over the Counter medication tylenol and charged \$5.00 for a prescription, everytime I am seen they want me to see the Nurse \$2.00, the Dr. \$8.00 and medication \$5.00 the Dr. were only writing a prescription for two week, then another \$5.00 if I Kite to see the Dr. again so I stop Kiteing them. How is it that you are a Nurse and I refused to render medical service to a person. We were finally issued extra blankets by Third shift supervisor. I filed a Complaint with the Kent County Board of Commissioners on 3-18-08 the Administration showed prejudice when they moved four what inmates next door to 58 but refused to move us. I've brought

Continue from Page 3

Paragraph(B).

off the Commissary store Tylenol and Muscle Rub to Noarai hasn't done any thing for me and now my finger on my right hand has a numb and a tingling feeling, still No X-rays or nothing has been done to trying find out what the problem is that Why I am seeking statutory damages from Medical Department in the amount of \$780,000,000 and punitive damages in the amount of 2.12 million

Dr. Bill Jacob, Dr. John Krieman, Dr. Carol, head Nurse Mary Colter, head Nurse Carmella Johnston and the Medical supervisor Cara Warhouse in a official and personal Capacity in the amount of \$500,000,000,00 and punitive damages of 12.35 million, each Name above in a personal Capacity I'm seeking \$350,000,000 from each person Name in the above action of the lawsuit, This include all medical staff at Kent County Correctional Facility.

Paragraph(C).

"Inhuman treatment"

While housed in (ASU) which is Adminstration segregation unit, I have been subjected to racial slurs, Vulgar obscene language and gestures, personal abuse, corporal punishment, harassment and intimidation by Deputy Russ Stonehouse, Deputy Holmes, Deputy Townsend; Deputy Townsend made a statement to me, "quoted" You black motherfucker think that the Courts really give a damn about you black fucker, Well they dont, So you can file anything you want, because nothing is going to happen, I can why this Deputy feel this way, because I went to his supervisor and administration, internal affairs he was right nothing happen, every day these three Deputy worked to was harassed, personal abuse, I endured intimidation, racial slurs, Vulgar language, my food being thrown on the floor, after filing a complaint with Jail Administration, Sheriff Lawrence A. Stilma, Internal affairs, Kent County Board of Commissioners and silent Observer Nothing, I also wrote Capt. Denary, Capt. Singleton, Sgt. Thomas, Sgt. Atron Case, Sgt. Tamara McDiarmid, Lt. Freeman, Lt. Numan and Robert Steel,

Nothing was still being done about these three Deputy at all, I was so stressed, depressed until I had lost my appetite to eat, I was unable to sleep at all. On Sept. 29, 08 Deputy Homes, Deputy Townsend started early that morning; saying "you didn't get to call that little bitch the weekend did you?" "Oh"!! that's right, you didn't get your fucking phone cards, Don't worry me, my buddy here speaking about Deputy Townsend went by and fucked her brains out!!! "Oh"!! you she give damn good head this went on from around 7:00 AM until lunch time, Deputy Homes took the tray with food on it, I told him all the bull shit you have said to me this morning and Townsend don't eight one off you ass holes come in here the (Cube) he attempted to bring the tray, that's when I threw piss on him, at the time I felt I justified in doing it, because the administration did nothing to prevent or stop the harassment. I had tried to get help about these three Deputy, but to No avail, I realize it was wrong but being stressed, depressed that was my only's out. Capt. Singleton assigned Sgt. Leisa Plaromaa to investigate the matter, she spoke with me and said she would be gone for a few day, when she returns, she would be on the case; its now Dec. I havent heard from her, I've seen her and Capt. Singleton on showing people tour thru the jail and that's it. I Kited Capt. Singleton back, he once again informed me that some one is checking into this, so far I guess they are still checking into it. Once I threw urine on the Deputy the administration did not have to send Sgt and Capt. down to DIA to impose a scourge upon me for throwing the urine on the Deputy, I was put in a Cell where they had taken the desk out and sealed the window up, my water was turn off on 9-29-08 water turn off; 9-30-08 first shift turn water on about 8AM to 8:15, Second shift turn water on for 10 minutes; Third shift never turned my water on at all; 10-1-08 first shift turn water on for 5 second; Second shift refused to turn water on at all, third shift did not turn water on at all; 10-2-08 first shift no water at all; Second shift no water turn on at all; Third shift no water turn on at all; 10-3-08 first shift turned water on for $\frac{1}{2}$ hrs.; Second shift no water; Third shift turn water on for 15 minutes; 10-4-08 first shift no water

turn on at all; Second shift around 7:pm my water was turn back on for good. For throwing urine on staff member is a Category III Violation which I have received 15 day cell restriction, which I can't use the phone, can't have visitors, no group activities, no recreation period outside the day room and can only order hygiene from Commissary store, but I was put on food loaf, Water turned off, all my personal hygiene taken which they still have, I have successfully completed the 15 day cell restriction and still have not received my hygiene back, they also have me on No Container where I get no milk or juices with my food, just water. This has gone way beyond disciplinary now, it's about revenge with Capt. Demory, Capt. Singletary and Sgt. Burnheart, I have also been denied access to the phone during regular business hours during the day to contact attorneys or family members or any other important calls that can only be made between the hrs of 8 AM to 4:pm such as the Veteran administration.

Paragraph (D).

as food

I am also seeking an injunction on the Jail Administration and the so called Dietician to force them to serve regular trays of food to inmates that are on disciplinary like general population, instead of Cold Cereal with four slices of bread, butter, No sugar for Cereal, milk, orange juice; for lunch you received four slices of bread one slice of Cold bologna, butter, one orange and milk; for dinner you get two burger King patties, one baked potato, two butter, four slices of bread, mustard, and green peas this is every day for 15 days or more, the Dietician has no idea what he is doing, he claims to be a dietician, a dietician should know that a dessert is part of your diet, your body has to retain a certain amount of sugar, the food when it reaches the floor is its cold, how do a person out of three meals a day only receive 3,500 Calaries that's for a person on a diet, that's why inmates are losing so much weight and hungry all the time, I Come in weighing a 176 lb. and Now I weight around 145, I've lost

the Dietician Mike Gray about the food, he informed me that the Bull Crap he served was approved by the Michigan Department of Correction, I really dont believe that one, because the Department of Correction does not serve bag lunches to inmates in Administrative Segregation. So in essence my Constitutional right have been violated, I have been denied the pursuit of happiness and liberty so there forth I Come before the Honorable Court seeking monetary damages in the amount of \$780,000.000.000 and 2.12 Million in punitive damages; all Medical staff \$500,000.000 and punitive damages 12.35 million, I am suing in a official capacity and personal Capacity, I am also seeking from each person Name in the suit in a personal Capacity \$350,000.000 each. I pray the Honorable Court will Grant me my relief on pain and suffering inflicting emotional stress, depression and undue hardship, personal abuse, harassment, intimidation.

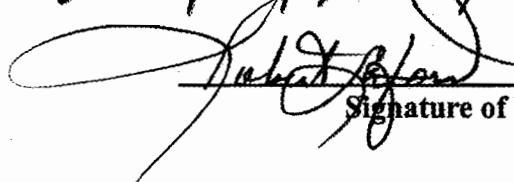
V. Relief

State briefly and precisely what you want the court to do for you.

I Come to the Honorable Courts seeking monetary damages in the amount of \$780,000,000 and 2.12 million in punitive damages, \$500,000,000, punitive medical damage 12.35 million and each slave in the above action I am seeking \$350,000,000 each personal capacity for cruel & unusually punishment, Personal abuse, corporal punishment and harassment that did not rise to the level of professionalism by the administration or Staff, which caused me Stress and depression, serious personality disorder, and also not wanting to eat and lost of weight, I ask the Court to grant my relief for damages & punitive damages

12-14-08

Date



Signature of Plaintiff

NOTICE TO PLAINTIFF(S)

The failure of a *pro se* litigant to keep the court apprised of an address change may be considered cause for dismissal.